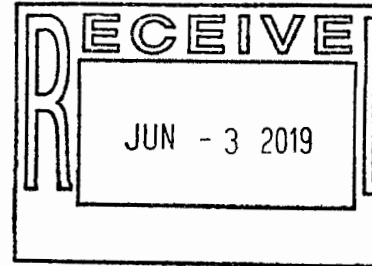


Please See

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA



UNITED STATES OF AMERICA

v.

Crim. No. 99-505-01

AXEL SANTOS_CRUZ

Comes now the Defendant, Axel Santos-Cruz, acting in a Pro-Se capacity and hereby respectfully moves this Court to grant the Defendant a continuance to file a Motion for Sentencing Reduction under Section 404 of the First Step Act to and including July 2, 2019 based on the following grounds:

1. The Defendant is presently acting in a Pro-Se capacity. The Defendant's Motion to Appoint Counsel regarding Section 404 of the First Step Act has been presently stayed by the Court.

2. The Defendant has almost no ability to communicate in English. This makes it, for all practical purposes problematic for the Defendant to prepare an adequate pleading regarding a Motion for Sentencing Reduction under Section 404 of the First Step Act. Consequently, the Defendant has had to rely on the assistance of other individuals which is compounded by frequent lock downs at this facility rendering it impossible during said lockdowns to communicate with others assisting him

3. The individuals assisting the Defendant, because of the newness of the First Step Act have a paucity of available supporting documents.


4. This Motion is not interposed for purposes of delay or hindrance.

5. The granting of this Motion by the Court will allow the Defendant the necessary time to fully present his arguments in support of a Sentencing Reduction under Section 404 of the First Step Act.

Wherefore, the Defendant respectfully moves the Court to grant this Motion for a Continuance to submit a Motion for Sentencing Reduction under Section 404 of the First Step Act to and including the 2nd day of July, 2019.

This the 29 day of MAY, 2019.

Respectfully Submitted,



Axel Santos-Cruz
Reg No. 51969-066
FCI Hazelton
P.O. Box 5000
Bruceton Mills, WV 26525

CERTIFICATE OF SERVICE

I hereby certify/declare pursuant to 28 U.S.C. Section 1746 to mailing by U.S.P.S. First-class mail by the Prison Mailbox rule a true and correct copy of this pleading to the following:

U.S. District Court
James A. Byrne United States Courthouse
601 Market Street
Room 2609
Philadelphia, PA 19106

The U.S. Attorney's office will be notified by the Court's ECF system as the Defendant is indigent.


Axel Santos-Cruz

Axel Santo-Cruz
Reg No. 51969-066
FCi Hazelton
P.O. Box 5000
Bruceton Mills, WV 26525

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30 MAY 2019 PM 7 L



Clerk of the Court
U.S. District Court
James A. Byrne U.S. Courthouse
601 Market Street
Room 2609
Philadelphia, PA 19106

Legal Mail

19106-179699

**U.S.M.S.
X-RAY**

